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Case No.: 2:11-CV-938-AKK

1. Pursuant to the Court's Scheduling Order of April 27, 2011, the above-referenced matter is currently set for trial in March, 2012. Under said scheduling order, the pleading amendment cutoff date is July 15, 2011 for Plaintiff and August 15, 2011 for Defendants.
2. The Parties have just begun to engage in discovery, and have been unable to schedule depositions at a mutually convenient date.

3. The parties have agreed that, due to conflicting schedules, the best time for them to schedule depositions in this case would be during the month of August, which will be beyond, at least, Plaintiff's deadline for amending the pleadings.
4. Accordingly, the parties respectfully request that the Court extend the current deadline for amendments to the pleadings for an additional 45 days for both Plaintiff and Defendant, and so doing should not necessitate any other amendments to the Court's current Scheduling Order.

WHEREFORE, PREMISES CONSIDERED Plaintiff and Defendant respectfully request this Honorable Court to continue the pleading amendment deadline in the Court's April 27, 2011 Scheduling Order by an additional 45 days for both Plaintiff and Defendant.

Respectfully submitted this the 22nd day of July, 2011.

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